At the meeting, the impact on the environment (us humans being included in the environment) was of utmost concern. Mr. Zastrow of Sutro Tower Inc. was not qualified nor did he have any substantial information to comment on the environmental impact of the antennas. Overwhelmed with questions and concerns about the impact on Midtown Terrace residents and surrounding neighborhood residents, he crumbled and quoted:

> "There are concerns regarding San Bruno Mountain's environment as well. There is wildlife at that location to consider." – Mr. Zastrow, Sutro Tower Inc. 9/3/97

This quote, by Mr. Zastrow, was a desperate attempt to defend the proposed site of the antennas. Mr. Zastrow, the quote came from your mouth. Yes, the antennas **will** have an environmental impact. Whether it be of aesthetic impact or the health of our families and children. **The proposed site to San Bruno Mountain should be considered!!!**

I, as a resident of this neighborhood, feel that the current antennas and the DTV antennas pose a substantial health risk to persons living in Midtown Terrace and surrounding neighborhoods. There is a more appropriate site on top of San Bruno Mountain to consider. I suggest you do the right thing and choose people's welfare over income earned.

Sincerely,

Christina Deardorff

A. Anthony Dodson
62 Aquavista Way, San Francisco, CA 94131
---
(415) 826-5343

September 1, 1997

Ms. Hillary E. Gitelman
The Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103-2414

Dear Ms. Gitelman:

Re: Sutro Tower Digital Television
Draft Environmental Impact Report
Written Comment Period extended to Sept. 10, 1997

There are three general areas I wish to comment on:

1. The lack of any description of directionality of the new antennas.
2. Unsupported and unexplained matters in the technical report on biological effects, and
3. Various typos and inconsistencies.

LACK OF ANY DESCRIPTION OF DIRECTIONALITY OF THE NEW ANTENNAS

I consulted a book, "Reference Data for Radio Engineers", published by Howard W. Sams & Co., Inc., (a subsidiary of I.T.T.) Sixth Edition, 1975. The book jacket indicates it was accepted for classroom use in more than 200 of our leading colleges and universities. It states at page 27-20:

> "ANTENNA ARRAYS
> The basis for all directivity control in antenna arrays is wave interference. By providing a large number of sources of radiation, it is possible with a fixed amount of power to greatly reinforce radiation in a desired direction while suppressing it in undesired directions. The individual sources may be any type of antenna....."

This indicates to me that the 10 new television antennas will have directional properties. Yet, the draft E.I.R. is silent on this point. Surely, Sutro would like to beam more power inland than out to sea.

Additionally, the reference book states at page 27-47:

> "DETERMINATION OF POWER DENSITIES
> In estimating the radiation hazards that may exist in front of an antenna, it is necessary to determine in which areas

> the power density is greater than the safe limit for short exposure, and in which areas indefinitely long exposure can be permitted. With a paraboloidal antenna the power density is greatest on the antenna axis, so that it is first necessary to determine if the power density exceeds 10 milliwatts per square centimeter at any point on the antenna axis, and if so, to what distance from the antenna does the power density exceed this safe limit for short exposure. The same estimate must then be made for a power density of 1 milliwatt per square centimeter, which is assumed to be the safe limit for indefinitely long exposure. At all distances where these limits are exceeded, estimates must be made of the radial distance from the antenna axis at which the power density is reduced to the required safe limit. From the estimated safe radial distance the minimum antenna elevation angle, relative to the terrain and buildings, may be determined....."

The safe limits for power density in this passage appear to be outdated but the principles are undoubtedly still in effect.

<u>It appears to me, from this passage, that the power density at the end of Farview Court, for instance, would vary depending on the direction the antennas were pointed.</u>

I can find nothing in the draft E.I.R. on this.

Surely, information on the antenna directionality is readily available from the manufacturer, or, if manufactured by Sutro, then readily available from their electrical engineer.

<u>Omitting this information appears to me to be a very serious omission.</u>

Since the power radiation is line-of-sight, why wouldn't reflectors or baffles shelter nearby homes from high density radiation?

UNSUPPORTED AND UNEXPLAINED MATTERS IN THE TECHNICAL REPORT ON BIOLOGICAL EFFECTS

1. What are Peter Polson's credentials?
2. What are Louis N. Heynick's credentials?
3. What are Asher Sheppard's credentials?
4. What are C. K. Chou's credentials?
5. How much was Woodward-Clyde paid for this report?
6. How many other broadcasters are utilizing substantially the same report?
7. Why was lack of peer-review used to exclude studies?
8. Are there any standards for peer review, and if so, what organization codified the standards?
9. Did C. K. Chou prepare a report on his peer review? If so, shouldn't a copy of his report be included in the E.I.R.?
10. What studies without peer-review conflict with the Technical Report's conclusions?

11. How is it that so many scientists have published studies (with peer reviews) that Polson finds unconvincing?
12. Mr. Polson's reviewed Milham's second study starting at page B-15 of his report. To paraphrase, he indicates that due to the small number of deaths, the results of the study are not convincing. How many deaths would make it convincing to Mr. Polson? Why?

VARIOUS TYPOS AND INCONSISTENCIES

1. On page 3-5, it states, "....the maximum permissible power density ranges from 1.00 to 2.69 milliwatts per square centimeter squared." I understand per square centimeter, but not "per square centimeter squared". How accurate is this draft E.I.R.?
2. I can't find locations 1 through 5 on the map in Figure 5 on page 3-8 indicating power density measurement locations.

Yours very truly,

A. Anthony Dodson

A. Anthony Dodson

cc: Steve Nahm
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AD September 1, 1997

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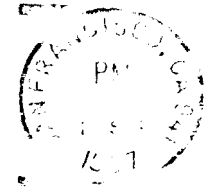

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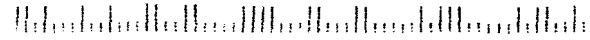

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---
(415) 826-5343

September 5, 1997

Ms. Hillary E. Gitelman
The Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103-2414

Dear Ms. Gitelman:

Re: Sutro Tower Digital Television
Draft Environmental Impact Report
Written Comment Period extended to Sept. 10, 1997

I have the following questions regarding Appendix A: Radio Frequency Levels - Engineering Analysis of Radio Frequency Exposure Conditions with Addition of Digital TV Channels prepared by Hammett & Edison, Inc., Consulting Engineers:

1. On Figure 5, Comparison of Measured RF Power Density with Calculated Values, I divided Calculated Power Density by % FCC Standard in order to obtain the FCC Standard and obtained the following:

Measurement Location	FCC Standard
1	.2167
2	.2339
3	.2450
4	.2450
5	.2451
6	.2134
7	.2340
8	.2162
9	.2215
10	.2628

How can the FCC Standard be different at different measuring locations? I understand the standard is dependent upon frequency so that the standard would be a blended figure taking into account the different frequencies being broadcast. But, why different at different locations?

2. I understand that RFR decreases by the square of the distance away from the antenna. In the tabulation of Calculated RF Power Density, I compared the percent of FCC Standard for existing stations at E-W 1,500 meters, N-S zero, .607%, with E-W 3,000 meters. N-S zero, .267%. I would have expected the 3,000 meter figure to be one fourth of the 1,500 meter figure, or .152, instead of the figure given, .267. Why the difference? Does it have anything to do with the

antennas emitting signals in a compressed vertical plane? If so, there should be an explanation of this.

3. On the page marked methodology, Appendix B, it states:
"The factor of 2.56 accounts for the increase in power density due to ground reflection."
How can the power density be two and a half times greater just from reflection? Unless the reflection were focused, I would expect that the most you could get from reflection would be a doubling, a factor of 2.0, and that in the real world you would get far less than that. This should be explained.

4. I do not understand the following from the Appendix B:
"The operation of the program is as follows: first, the antenna height, relative field factors due to antenna azimuth and elevation pattern, and effective radiated power are input for each station at Sutro Tower."

Is the antenna height part of the relative field factor (RFF)?

There should be an explanation of what antenna azimuth is.

There should be an explanation of what elevation pattern is.

5. The following from Appendix B needs clarification:
"The factor of 1.64 is the gain of a half-wave dipole relative to an isotropic radiator."
Are all the antennas on Sutro Tower half-wave dipoles?

In the drawing on Figure 1A I see things that don't look like dipoles. Are they all dipoles?

When I look up at Sutro Tower I see parabolic antennas which I can't find on Figure 1A. Are parabolic antennas the same as dipoles?

The Woodward-Clyde drawing of the DTV antennas look more like panel antennas than dipoles, although the draft E.I.R. doesn't describe the type. Does the factor of 1.64 apply to the DTV antennas anyway? This should be explained.

There should be an explanation as to how different types of antennas (if there are such) are accounted for in Methodology, Appendix B.

6. The denominator in the formula in Methodology Appendix B includes the value, 4 pi. This should be explained.

7. Page 3 states:
"The computer program is supposed to give high, 'worst-case' numbers."
Why wasn't a computer program devised to give accurate

numbers instead of worst-case?

8. What were the qualifications of the Department of Public Health representative who came along to help with the meter readings, in terms of radio engineering education and experience?

9. When the Holaday meter was calibrated, was it adjusted to give the proper reading or was a conversion factor derived in order to correct its reading or was some other method employed to calibrate?

10. When the meter was calibrated, what was used as the standard?

11. There should be an analysis of all the facts and circumstances taken into account, including relative weight given to each, in the determination that no peer review was to be prepared for the engineering analysis.

Yours very truly,

/s/ Anthony Dodson

A. Anthony Dodson

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ddd September 5, 1997

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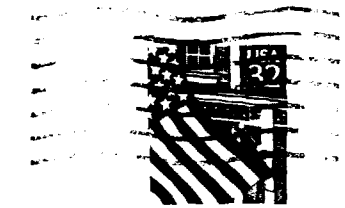

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September 8, 1997

Ms. Hillary E. Gitelman
The Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103-2414

Dear Ms. Gitelman:

Re: Sutro Tower Digital Television
Draft Environmental Impact Report
Written Comment Period extended to Sept. 10, 1997

I have the following questions regarding Section 6.3, OFF-SITE ALTERNATIVES relating to the San Bruno mountain alternative:

1. This section cites FCC Rules (e.g., Section 73.685(b)) but no citation is given for the section giving the deadline for beginning DTV signal broadcasts in the Bay Area which is said to be October 1998. Since the FCC deadline is the reason for the E.I.R., it is appropriate that it be cited so that interested parties can check it.

2. Is there a procedure by which Sutro can obtain an extension of time from the FCC?

3. What are the penalties for failing to make the deadline?

4. The draft E.I.R. states on page 6-5:
   "This alternative would include construction of one or more approximate 325-foot tall towers in the vicinity of the existing broadcasting tower on San Bruno Mountain on which DTV antennas would be installed."

   Why wouldn't DTV antennas be added to existing towers at San Bruno similarly to the manner in which they are proposed to be added to the Sutro Tower?

5. The draft E.I.R. states on page 6-9:
   "Sutro Tower, Inc.'s project objective eliminates any need for new tower construction, whereas any project alternative is expected to require new construction and thus this additional substantial delay with likely resulting FCC rule violations as to the DTV deadlines."
   Why is new tower construction expected instead of adding to existing San Bruno towers? If there are technical reasons why DTV antennas cannot be added to existing towers at San

Bruno the reasons should be given.

6. The draft E.I.R. states on page 6-9:
"In contrast, as noted, any alternative site for the project will likely require the construction or substantial enlargement of tower facilities at the alternative site(s)."
In reason 3 for rejection, new construction at San Bruno was given as the reason while in reason 4, substantial enlargement of a San Bruno tower was also given. A comparison should be given in the E.I.R. of the Sutro Tower strengthening and reinforcement versus the substantial enlargement of the San Bruno tower.

7. The draft E.I.R. states on page 6-9:
"Thus any project alternative would, in itself, necessarily create substantially greater environmental impacts than the modest modification required for Sutro Tower to accommodate the new DTV antenna unit."

There is no showing in the draft E.I.R. that the modifications to Sutro Tower would be more modest than substantial enlargement of the San Bruno tower. In addition, there is no E.I.R. provided for the substantial enlargement of the San Bruno tower. The draft E.I.R. statement that there would be greater environmental impact from the substantial enlargement of the San Bruno tower is unsupported. The only supporting information provided is the use of the adjective modest versus the adjective substantial. The E.I.R. should cite the regulations concerning preparation of E.I.R.s and explain how this unsupported information complies with the regulations. Or, if such unsupported information does not comply with E.I.R. regulations, there should be a complete dissertation on the San Bruno tower modifications and environmental impacts.

8. The draft E.I.R. states on page 6-5:
"This same report shows that for these three stations, DTV signals from San Bruno Mountain would be able to serve all of San Francisco."

and on page 6-7:
"Consistent with FCC's finding in its initial authorization..... (4) providing lesser household coverage over the geographically varied terrain of the San Francisco area due to signal blocking, degradation and reflection by surrounding land forms....."

The consistency of FCC's original finding with the 1993 Browne report needs to be clarified. It appears that, contrary to reason 1 for rejection, it is not consistent.

9. Throughout the draft E.I.R. REFERENCES appear at the end of sections but with no keying to the passages to which they

refer. For example, on page 6-9, under REFERENCES is printed, "Jay Watson, President, Watson Communications, telephone conversation, January 30, 1997." What does this refer to? Can this be corrected?

Yours very truly,

A. Anthony Dodson

A. Anthony Dodson

cc: Steve Nahm
P. O. Box 31097
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53 Aquavista Way
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September 8, 1997

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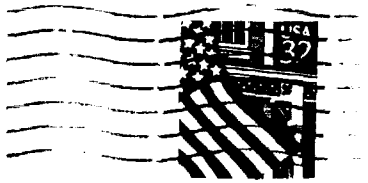

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California Society of Enrolled Agents

Former Controller,
EMPORIUM department stores

AWARDED,
Certificate of Educational Achievement by the American Institute of CPAs in recognition of successful completion of an integrated program in PERSONAL FINANCIAL PLANNING.

October 9, 1997

Honorable Willie L. Brown, Jr., Mayor
City and County of San Francisco
401 Van Ness, Room 336
San Francisco, CA 94102

Dear Mayor Brown:

The Planning Department issued a draft Environmental Impact Report (EIR) on July 9, 1997 for the Sutro Tower Digital Television Antennas.

THE NEW DIGITAL ANTENNAS SHOULD BE PLACED ON MOUNT SAN BRUNO, NOT SUTRO.

I sent three different letters with my questions to Hillary Gitelman in the Planning Department during the public comment period.

I hope my questions about the matters in the draft EIR will be answered in the final EIR when it comes out.

I'm enclosing copies of my letters with the hope that you will have someone on your staff check with Ms. Gitelman to make sure that my questions are answered in the final EIR which is now being prepared.

Under the provisions of the California Environmental Quality Act (CEQA), San Francisco is required to consider the potential environmental effects associated with this project. The types of environmental issues that must be considered include noise, water, aesthetics, human health and safety, light, and public facilities, among others. The CEQA process enables varying degrees of review, which include categorical exemptions, negative declarations, or EIRs.

I am concerned that the Sutro EIR is low-balling the radiated power from the ten proposed digital antennas. The EIR shows 500 kilowatts for each of the proposed new UHF digital stations even though existing UHF stations radiate 1,333 to 5,000 kilowatts, up to ten times more. I am concerned that Sutro may follow this

low-ball 500 kilowatt EIR with subsequent negative declarations (instead of EIRs) for 5,000 kilowatts for each station thus circumventing public awareness. All the facts and circumstances surrounding this subject should be covered in the final EIR now being prepared.

Co-location is locating antennas for more than one provider on a single site. Sutro Tower is a co-location since it provides for 74 existing stations.

One of Sutro's objectives (2.1.2.) is maintaining minimum broadcast signal interference with and separations between other TV and non-TV broadcasters and communication service providers in accordance with FCC rules.

Sutro's existing antennas are for:

5	VHF TV stations
5	UHF TV stations
4	FM stations
20	Microwave stations
40	Private radio stations
--	
74	

Sutro proposes to add 10 UHF digital TV stations bringing the total to 84.

This co-location of 84 stations may create signal interference between antennas, which would be contrary to Sutro's (and FCC's) objective of maintaining minimum interference. All the facts and circumstances surrounding this subject as well as their study showing what amount of interference there will be, should be covered in the final EIR which is now being prepared.

It appears to me from all the information in the draft EIR and all the questions it leaves unanswered that the new digital TV antennas SHOULD BE PLACED ON SAN BRUNO MOUNTAIN, NOT SUTRO.

I am sure that if you read the draft EIR and my enclosed letters you will agree.

Yours very truly,

A. Anthony Dodson

A. Anthony Dodson, CPA

cc: Supervisor Barbara Kaufman
Board of Supervisors-Reception, Room 308
Veterans Building, 401 Van Ness Avenue

San Francisco, CA 94102

Supervisor Tom Ammiano

Supervisor Sue Bierman

Supervisor Amos Brown

Supervisor Leslie Katz

Supervisor Susan Leal

Supervisor Jose Medina

Supervisor Gavin Newsom

Supervisor Mabel Teng

Supervisor Michael Yaki

Supervisor Leland Y. Yee

cc: (without the attachments which were mailed previously)
Hillary E. Gitelman
The Environmental Review Officer
Planning Department
1660 Mission Street, 5th Floor
San Francisco, CA 94103-2414

Steve Nahm, Midtown Terrace Homeowners' Assn.
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dd October 9, 1997

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150 Graystone Terrace
San Francisco, CA 94114
September 05, 1997

Hillary E. Gitelman
The Environmental Review Officer
Planning Department
1660 Mission Street, 5th floor
San Francisco, CA 94103-2414

Re: Sutro Tower Digital Television Draft Environmental Impact Report

Dear Ms. Gitelman:

I have requested a copy of the Environmental Impact Report but have not yet received it. I need additional time to read and study the contents of the report.

I live in the neighborhood several blocks from the Sutro TV Tower. I have been a resident of the area for over 25 years. I have many friends who live right under the tower on Palo Alto Avenue and on St. Germain Avenue and visit them in their homes frequently.

I am concerned about the safety of the tower. It has been on the Mt. Sutro site since 1971. Mr. Gene Zastrow, current general manager of Sutro Tower, Inc. has written letters stating that the tower is substantially corroded and is in need of repair. Now the proposal is to add another antenna at 760 feet to extend down 125 feet. How much weight will this add to a structure built to support only NTSC antennas for 200 feet of the tower? The tower is 26 years old and built to 1966 earthquake standards. What will happen in the event of an earthquake of a severe magnitude?

Is adequate insurance carried by Sutro Tower, Inc. to take care of damage to surrounding properties and the two water reservoirs at the base of the tower? How are the water reservoirs insured in the event Sutro Tower falls and causes destruction to the city's water supply?

How will Sutro Tower failure and reservoir damage affect Neighborhood Emergency Response Teams in event of a disaster such as a fire in the heavily forested eucalyptus acreage extending from Mt. Sutro to Parnassus Avenue?

There are many other concerns about Sutro Tower. Noise from gale winds blowing through the tower; interference to telephones, TVs, radios, VCRs, garage door openers; large and heavy objects blowing off the tower, metal debris and paint from tower maintenance, are experienced by numerous neighborhood residents.

There is an existing non-residential San Bruno Mountain site that

should be explored before considering any addition to Sutro Tower. A comparison needs to be made between both sites and a detailed presentation should be demonstrated to residents in the tower area and concerned San Francisco residents before allowing any construction to proceed.

As a public official, it is your duty to impartially review the proposed project and determine the most environmentally safe alternative for the human beings who live in the area.

Sincerely yours,

Elaine A. Eklund

Elaine A. Eklund

Ms. Hillary Gitelman
Office of Environmental Review
Dept. of City Planning
San Francisco, CA

Dear Ms. Gitelman:

As a neighbor of Mt. Sutro Tower for 25 years I want to list my complaints and state my objection to any new additions or expansion to the tower.

1. Danger and Safety to the neighborhood i.e. earthquake, air traffic, falling equipment, etc.
2. Constant annoyance to the neighbors with traffic, deliveries to the tower, maintenance trucks, and repair noise on the tower.
3. High levels of sounds from strong, high winds that are frequent in winter time, and all year round.
4. A threat for greater impacts of future transmissions from the tower, causing great concern over the health risks in the neighborhood.
5. The tower poses a threat to property values in the area.

To sum up my complaints and concerns, the proposed Draft EIR is in direct conflict with adopted environmental plans, concern for the citizens of San Francisco and community goals.

Catherine A. Fitzpatrick
86 Clarendon Ave.
San Francisco, CA 94114
September 4, 1997

JAMES L. FITZPATRICK
86 CLARENDON AVENUE
SAN FRANCISCO, CA 1997
September 4, 1997

City Planning Commission
San Francisco, CA

Ref: Sutro Tower Expansion
Draft EIR--Case 96544E

Dear Sirs:

As a homeowner in the shadow of Sutro Tower, I object to any expansion o operations of Sutro Tower, Inc. at its present facilities. The project t do major structural changes to the tower to reinforce it to enable a 12 foot vertical member to be added is a substantial change. This propos addition would accommodate a series of High Definition Television antenn to enable all the current broadcasters to radiate HDTV signals from th structure. These signals are in addition to the radiation from the analo TV signals, and also from radio, cellular phone, security/disaster contr and other devices that are not publicly advertised that have been added t the tower over the years as Sutro Tower, Inc. has aggressively "so space".

The DOUBLE WHAMMY of radiation from both analog and digital signals, pl all the other devices that may be added to a substantially reinforced tow will continue for at least nine years.

The operation of these devices in a residential neighborhood, and adjace to a designated greenbelt is another incursion of a commercial, for profi "quasi public service" venture. This is a totally inappropriate busine for the area.

There has been no mention in the EIR of the on-ground support facilit needed to accommodate the new broadcast transmitters, the disruption duri construction, and the ultimate impact on the neighborhood environment.

Furthermore, I strongly object to the lack of real scientific data th reveals the health hazards, history of illness and interference wi conduct of our daily lives, and that of all the neighbors in the vicinit The latest epidemiologic study, as admitted by the Planning Departme environmental reviewer, was based on data at least five years old, a does not reflect today's reality.

I strongly support the concept of locating all the HDTV antennae to appropriate area segregated from our densely populated neighborhood. Th would allow a phase out of all broadcasting from the Sutro Tower site the end of a nine year period, and give us back our neighborhood.

There are locations in the Bay Area that would be more suitable, and sti enable class A broadcast coverage.

Very truly yours,

James L. Fitzpatrick

jlf90497.jlf